

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V



DATE: August 1, 2013

SUBJECT: Comments on the "Phase II Investigation Summary Technical Memorandum" and "Internal Draft Summary of Proposed Phase III Remedial Investigation Activities", East Troy Contaminated Aquifer Site

FROM: Edward Karecki, U.S. Fish and Wildlife Service Biologist

TO: Shari Kolak, Remedial Project Manager

**Phase II Investigation Summary Technical Memorandum**

1) This document only addresses VOCs. Are other site related contaminants present? Sample SB-HOB7-O-0512, the only surface soil grab sample shown in Table 7 of the Phase I, shows detections of pesticides, PCBs, PAHs and metals. The Dieldrin detection, for example, exceeds several ecological soil screening benchmarks.

2) Section 4.0, D: It is stated here that contaminated sediment is unlikely to be present. This should be verified. Contaminated sediment could also be present in a deposition zone downstream of the channelized section.

**Internal Draft Summary of Proposed Phase III Remedial Investigation Activities**

1) Figure 2, Ecological Conceptual Site Model: Ecological receptors can be exposed to surface and subsurface soil and should be included in the model. The grassy areas within the area of concern would be attractive to certain receptors, such as the American Robin.

2) : The ecological risk assessment should be prepared in accordance with Ecological Risk Assessment Guidance for Superfund (EPA 540-R-97-006) and ECO Update/Ground Water Forum Issue Paper: Evaluating Ground-Water/Surface-Water Transition Zones in Ecological Risk Assessment (EPA-540-R-06-072).